

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA)
)
 v.) Criminal No. 04-50 Erie
)
JOHN JOSEPH PRICE, JR.)

**MOTION TO EXTEND THE TIME FOR THE
FILING OF PRETRIAL MOTIONS**

AND NOW, comes the defendant, JOHN JOSEPH PRICE, JR., by his attorney, Thomas W. Patton, Assistant Federal Public Defender, and respectfully moves this Honorable Court for an Extension of Time to File Pretrial Motions, and in support thereof sets forth as follows:

1. The defendant, John Joseph Price, Jr., has been charged in a seven-count indictment with a violations of Title 21, U.S.C. §§ 841(a)(1), 841(b)(1)(C), 841(c)(1) and 846; manufacture methamphetamine, possession of List I & II chemicals and attempt to manufacture methamphetamine.

2. On or about November 2, 2005, an arraignment was held before United States District Magistrate Judge Susan Paradise Baxter.

3. Pursuant to Local Criminal Rule 16 and Federal Rule of Criminal Procedure 45(a), certain types of pretrial motions are due on November 17, 2005.

4. Additional time is needed to complete counsel's investigation of the facts and law before informed decisions can be made concerning the filing of pretrial motions.

WHEREFORE, defendant, John Joseph Price, Jr., respectfully requests an extension of thirty (30) days to file pretrial motions.

Respectfully submitted,

/s/ Thomas W. Patton

Thomas W. Patton

Assistant Federal Public Defender

PA ID #88653